

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

ROBERT STOUD

Plaintiff

v.

SUSQUEHANNA COUNTY

Defendant

CIVIL ACTION

No. 3:17-CV-2183-MEM

MOTION TO EXTEND DEADLINE FOR EXPORT REPORTS

NOW COMES, the Plaintiff, Robert Stoud, by and through his counsel, and in support of this motion, avers as follows:

1. Pursuant to an Order dated April 10, 2018 (Doc. 14) entered by this Honorable Court, expert reports due are due from the Plaintiff on or before October 5, 2018; from the Defendant on or before November 9, 2018; supplementations, if any, by the Plaintiff on or before December 3, 2018 and by Defendant on or before January 4, 2019.
2. The deadline for dispositive motions in this matter was recently extended to November 9, 2018 (Doc. 23).
3. There is an outstanding Request for Production of Documents Directed to the Defendant in this matter.
4. The Plaintiff is seeking to extend the deadlines for expert reports.

5. The requested extension will not unreasonably delay trial.

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court extend the deadlines for expert reports.

Respectfully Submitted:

/s/ Gerard M. Karam, Esquire
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/s/ Christopher J. Szewczyk, Esquire
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Valvano
321 Spruce Street
Suite 201
Scranton, PA 18503
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Date: October 4, 2018

CERTIFICATE OF CONCURRENCE

The undersigned hereby certifies that on October 4, 2018, he contacted A. James Hailstone, Esquire requesting concurrence in the foregoing motion.

Attorney Hailstone concurs in Plaintiff's request.

/s/ Christopher J. Szewczyk, Esquire
Christopher J. Szewczyk, Esquire
Mazzoni, Karam, Petorak, and
Valvano
321 Spruce Street
Suite 201
Scranton, PA 18503
(570) 348-0776

Dated: October 4, 2018

CERTIFICATE OF SERVICE

I, Gerard M. Karam, Esquire, hereby certify that I have served a true and correct copy of the foregoing document via electronic service/ECF system on the 4th day of October, 2018.

/s/ Gerard M. Karam, Esquire
Gerard M. Karam, Esquire